

CJR/ SM: USAO#2014R00531

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2014 AUG 21 P 2:35

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AT BALTIMORE

CRIMINAL NO. **RDB-14-0389**

(Conspiracy to Distribute and Possess
with Intent to Distribute Cocaine and
Heroin, 21 U.S.C. § 846; Attempted
Possession with Intent to Distribute
Cocaine and Heroin, 21 U.S.C. § 846;
Forfeiture, 21 U.S.C. § 853, 28 U.S.C. §
2461(c) and Fed. R. Crim. P. 32.2(a))

UNITED STATES OF AMERICA

v.

ANTOINE DEMARR WASHINGTON,

JERMAINE CANNADY,

GUY BORDES AGNANT, Jr.,

CORNELL DION BROWN, Jr.,

DOMINIC WILLIAM PARKER,

VINCENT COOPER,

RONALD TIMOTHY SAMPSON,

DONTE EUGENT TAYLOR,

TAVON HOPKINS,

Defendants.

INDICTMENT

COUNT ONE

**(Conspiracy to Distribute and Possess with Intent to Distribute
Cocaine and Heroin)**

The Grand Jury for the District of Maryland charges that:

1. From in or about November 2013 through in or about August 2014, in the District
of Maryland and elsewhere,

**ANTOINE DEMARR WASHINGTON,
JERMAINE CANNADY,
GUY BORDES AGNANT, Jr.,
CORNELL DION BROWN, Jr.,
DOMINIC WILLIAM PARKER,
VINCENT COOPER,
RONALD TIMOTHY SAMPSON,
DONTÉ EUGENE TAYLOR, and
TAVON HOPKINS**

the defendants herein, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with each other, and with Michael Barrett and others known and unknown to the Grand Jury to knowingly and intentionally distribute and possess with intent to distribute cocaine, a Schedule II controlled substance and heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1).

Quantity of Controlled Substances Involved in the Conspiracy

2. With respect to **ANTOINE DEMARR WASHINGTON**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A);

3. With respect to **JERMAINE CANNADY**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A);

4. With respect to **GUY BORDES AGNANT, Jr.**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A);

5. With respect to **CORNELL DION BROWN, Jr.**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A);

6. With respect to **DOMINIC WILLIAM PARKER**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of 21 U.S.C. § 841(b)(1)(A);

7. With respect to **VINCENT COOPER**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A);

8. With respect to **RONALD TIMOTHY SAMPSON**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other

conspirators reasonably foreseeable to him, is 100 grams or more of a mixture and substance containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(B)(i);

9. With respect to **DONTE EUGENE TAYLOR**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 100 grams or more of a mixture and substance containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(B)(i); and

10. With respect to **TAVON HOPKINS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A).

Title 21, United States Code, Section 846.

COUNT TWO
(Attempted Possession with Intent to Distribute Cocaine and Heroin)

The Grand Jury for the District of Maryland further charges that:

On or about August 11, 2014, in the District of Maryland, the defendant,

ANTOINE DEMARR WASHINGTON,

did knowingly and intentionally attempt to possess with the intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A).

Title 21, United States Code, Section 846.

COUNT THREE
(Attempted Possession with Intent to Distribute Cocaine and Heroin)

The Grand Jury for the District of Maryland further charges that:

On or about August 11, 2014, in the District of Maryland, the defendant,

JERMAINE CANNADY,

did knowingly and intentionally attempt to possess with the intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A).

Title 21, United States Code, Section 846.

COUNT FOUR
(Attempted Possession with Intent to Distribute Cocaine)

The Grand Jury for the District of Maryland further charges that:

On or about August 11, 2014, in the District of Maryland, the defendant,

GUY BORDES AGNANT, Jr.,

did knowingly and intentionally attempt to possess with the intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of 21 U.S.C. § 841(b)(1)(A).

Title 21, United States Code, Section 846.

COUNT FIVE
(Attempted Possession with Intent to Distribute Cocaine)

The Grand Jury for the District of Maryland further charges that:

On or about August 11, 2014, in the District of Maryland, the defendant,

CORNELL DION BROWN, Jr.,

did knowingly and intentionally attempt to possess with the intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of 21 U.S.C. § 841(b)(1)(A).

Title 21, United States Code, Section 846.

COUNT SIX
(Attempted Possession with Intent to Distribute Cocaine and Heroin)

The Grand Jury for the District of Maryland further charges that:

On or about August 11, 2014, in the District of Maryland, the defendant,

DOMINIC WILLIAM PARKER,

did knowingly and intentionally attempt to possess with the intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A).

Title 21, United States Code, Section 846.

COUNT SEVEN
(Attempted Possession with Intent to Distribute Cocaine and Heroin)

The Grand Jury for the District of Maryland further charges that:

On or about August 11, 2014, in the District of Maryland, the defendant,

VINCENT COOPER,

did knowingly and intentionally attempt to possess with the intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, all in violation of 21 U.S.C. § 841(b)(1)(A).

Title 21, United States Code, Section 846.

COUNT EIGHT
(Attempted Possession with Intent to Distribute Cocaine and Heroin)

The Grand Jury for the District of Maryland further charges that:

On or about August 11, 2014, in the District of Maryland, the defendant,

RONALD TIMOTHY SAMPSON,

did knowingly and intentionally attempt to possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, in violation of 21 U.S.C. § 841(b)(1)(B)(ii); and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(A)(i).

Title 21, United States Code, Section 846.

COUNT NINE
(Attempted Possession with Intent to Distribute Cocaine and Heroin)

The Grand Jury for the District of Maryland further charges that:

On or about August 11, 2014, in the District of Maryland, the defendant,

DONTE EUGENE TAYLOR,

did knowingly and intentionally attempt to possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, in violation of 21 U.S.C. § 841(b)(1)(B)(ii); and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(A)(i).

Title 21, United States Code, Section 846.

COUNT TEN
(Attempted Possession with Intent to Distribute Cocaine)

The Grand Jury for the District of Maryland further charges that:

On or about August 11, 2014, in the District of Maryland, the defendant,

TAVON HOPKINS,

did knowingly and intentionally attempt to possess with the intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of 21 U.S.C. § 841(b)(1)(A).

Title 21, United States Code, Section 846.

FORFEITURE

The Grand Jury further finds that:

1. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of the Controlled Substances Act, as alleged in Counts One through Ten, the defendants shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

2. The property to be forfeited includes, but is not limited to, the following:

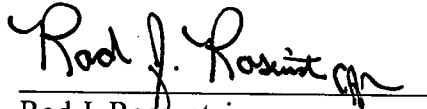
- a. A money judgment in an amount no less than \$1,000,000;
- b. \$397,792.05 in United States currency seized at the time of the defendants' arrests;
- c. A 2006 Acura MDX, VIN 2HNYD18946H502556; and
- d. A 2006 Ford F150 SuperCrew, VIN 1FTPW14546KD38054

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

21 U.S.C. § 853; 28 U.S.C. § 2461(c); Fed. R. Crim. Pro. 32.2(a)


Rod J. Rosenstein
United States Attorney

A TRUE BILL

SIGNATURE REDACTED

Foreperson

Date:

8-21-14